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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JONATHAN SOUVANNASANE,  
  
Defendants.

CASE NO. 1:23-CR-00042-JLT-SKO  
1:15-CR-00167-JLT-KSO

STIPULATION TO CONTINUE EXTEND  
BRIEFING SCHEDULE; FINDINGS AND ORDER

DATE: September 9, 2024  
COURT: Hon. Jennifer L. Thurston

**STIPULATION**

The government, by and through United States Attorney Phillip A. Talbert and Assistant United States Attorney and Kimberly A. Sanchez, and the defendant Jonathan Souvannasane, by and through his counsel of record, Yan Shrayberman, hereby stipulate as follows.

1. This matter is currently set for sentencing and disposition on September 9, 2024, in this Court, and the parties' supplemental briefing is due on July 8, 2024.
2. By this stipulation, the parties now move to reset the briefing schedule as follows.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) On July 3, 2024, the transcript of the guilty plea became available.
  - b) The parties desire additional time to review the transcript, continue discussions regarding the possibility of defendant withdrawing his pending motion to withdraw his guilty plea and proceeding to sentencing instead of proceeding on the motion.
  - c) The parties request their briefing due on or before August 26, 2024, which is two

1 weeks prior to the scheduled sentencing date.

2 d) Additionally, defense begins a trial in state court later this week, and due to time  
3 constraints related to that, would like additional time as requested above.

4 IT IS SO STIPULATED.

5 Dated: July 8, 2024

6 PHILLIP A. TALBERT  
United States Attorney

7 /s/ KIMBERLY SANCHEZ  
8 KIMBERLY SANCHEZ  
Assistant United States Attorney

9 Dated: July 8, 2024

10 /s/ YAN SHRAYBERMAN  
11 YAN SHRAYBERMAN  
Counsel for Defendant  
Jonathan Souvannasane

12  
13  
14 **FINDINGS AND ORDER**

15 IT IS SO FOUND.

16  
17 IT IS SO ORDERED.

18 Dated: **July 8, 2024**

19   
20 UNITED STATES DISTRICT JUDGE